

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CITY OF DALLAS,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 3:15-cv-02069-K
	§	
DELTA AIR LINES, INC., SOUTHWEST	§	
AIRLINES CO., VIRGIN AMERICA INC.,	§	
AMERICAN AIRLINES, INC., UNITED	§	
AIRLINES, INC., SEAPORT AIRLINES,	§	
INC., UNITED STATES DEPARTMENT	§	
OF TRANSPORTATION and THE	§	
FEDERAL AVIATION	§	
ADMINISTRATION,	§	
	§	
Defendants,	§	

UNOPPOSED MOTION TO WITHDRAW AS COUNSEL
FOR DELTA AIR LINES, INC.

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant Delta Air Lines, Inc. (“Delta”) respectfully requests that its counsel Kenneth P. Quinn and Jennifer E. Trock, formerly with Pillsbury Winthrop Shaw Pittman LLP, be permitted to withdraw as counsel for Delta in this matter. In support of this motion and as required by Local Rule 83.12(a), Delta states:

1. On June 24, 2015, Kenneth P. Quinn and Jennifer E. Trock filed their Notices of Appearance as counsel for Delta. (Doc. 34, 35)
2. They have served as co-counsel throughout this case, with William B. Dawson, Lead Counsel (Doc. 46), and Karl Nelson, Ashley Johnson, and Russell Falconer of Gibson, Dunn & Crutcher LLP as counsel of record for Delta.

3. Mr. Quinn and Ms. Trock recently changed law firms and joined Baker McKenzie, LLP. As a result of their change in law firms, they have identified a need to withdraw as counsel for Delta in this lawsuit.

4. Delta consents to their withdrawal, with no need to substitute any counsel from their prior firm. Mr. Dawson and his co-counsel at Gibson, Dunn & Crutcher LLP will remain as counsel of record for Delta and Mr. Dawson will continue to serve as lead counsel.

5. As set forth in the Certificate of Conference, Ms. Trock and Mr. Quinn have conferred with counsel for the City of Dallas and Southwest Airlines, who have stated they are unopposed to this motion.

6. Grant of this motion will not prejudice any party, nor cause any delay.

7. Accordingly, Delta respectfully requests that Mr. Quinn and Ms. Trock be allowed to withdraw as counsel for Delta in this case.

Respectfully submitted,

/s/ Jennifer E. Trock

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CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel of the affected parties regarding the substance of the foregoing motion. Counsel of record advised they do not oppose the relief sought herein.

/s/ Jennifer E. Trock

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel who have registered with the Court. All others were served a copy via U.S. mail.

/s/ Jennifer E. Trock